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October 8, 2020

Application granted.
SO ORDERED.
Dated: 10/15/2020

VIA ECF FILING

Hon. P. Kevin Castel, United States District Judge
Southern District of New York
500 Pearl Street
New York NY 10007

Re: United States v. Grasso et al., 20-Cr. 163 (PKC)



P. Kevin Castel
United States District Judge

Dear Judge Castel:

The undersigned represents defendant Conor Flynn in the above referenced indictment and write to respectfully request, pursuant to Fed. R. Crim P. 10(b), that the Court allow Mr. Flynn to waive his personal appearance in his October 28, 2020 arraignment and the initial conference.

Attached as Exhibit A is a written waiver of appearance executed by Mr. Flynn. The Government has no objection to this request.

As the court is aware, Mr. Flynn now resides in Michigan. His attendance at the arraignment would require him to drive or fly from that location to New York City, and given the public health situation in New York City relating to the COVID 19 pandemic, I respectfully request the Court grant Mr. Flynn's waiver of personal appearance.

As reflected in the written waiver of appearance, Mr. Flynn has received a copy of the above referenced superseding indictment and I have reviewed it with him. Mr. Flynn enters a plea of "Not Guilty," to Count One. Moreover, given the current national health emergency created by the Covid 19 Pandemic, I respectfully request to appear in this matter telephonically.

Respectfully submitted,

/s/ Andrew J. Mollica
On Behalf of Connor Flynn

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

.....
UNITED STATES OF AMERICA,

20 CR 163 (PKC)

-against-

Louis Grasso et al.,

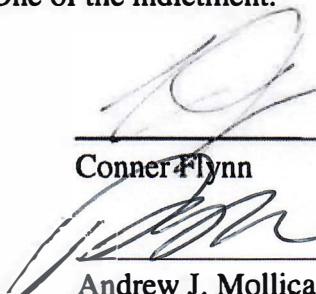
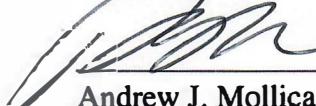
Defendants

.....
X

WAIVER OF APPEARANCE AT ARRAIGNMENT

I Conner Flynn declare and affirm as follows:

1. I am a defendant in the above captioned case and hereby waive my appearance at the arraignment and initial conference on this super seeding indictment.
2. I am aware the arraignment is scheduled for October 28, 2020 at 10:30 AM before the Honorable P. Kevin Castel in the Southern District of New York.
3. I have received a copy of the indictment in the above related case and reviewed the indictment with my attorney Andrew J. Mollica.
4. I plead not guilty to Count One of the indictment.

 10/8/20
Conner Flynn Date
 10/8/20
Andrew J. Mollica Date
Counsel for
Conner Flynn